

December 18, 2001

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

RE: Olefins Panel Test Plan for Fuel Oils Category, HPV Registration No.

Dear Ms. Whitman:

The Olefins Panel of the American Chemistry Council submits its test plan for the Fuel Oils Category under the High Production Volume (HPV) Challenge Program. The CAS numbers in this category are listed in the attached table. This category includes CAS numbers that represent streams with a carbon number distribution that ranges predominantly from C8 and higher. The plan addresses the category by evaluating data available for the CAS numbers in the category and for products not in this category whose data can be used to read across to products in the category. Supporting data from key components will also be used. No additional testing will be conducted for potential human health effects, but aquatic toxicity and biodegradation tests are proposed for some streams.

In preparing this test plan, the Panel has given careful consideration to the principles contained in the letter EPA sent to all HPV Challenge Program participants on October 14, 1999. As requested by EPA in that letter, the Panel has sought to maximize the use of scientifically appropriate categories of related chemicals and of structure activity relationships. The Panel has coordinated with other industry groups covering related chemicals. Additionally, and also as requested in EPA's letter, in analyzing the adequacy of existing data, the Panel has conducted a thoughtful, qualitative analysis rather than a rote checklist approach. The Panel has taken the same thoughtful approach when developing this test plan and believes it conforms to those principles.

If you have any questions, please contact Elizabeth Moran, Manager of the Olefins Panel at (301) 924-2006 or Elizabeth_Moran@americanchemistry.com.

Courtney M. Price
Vice President, CHEMSTAR

cc: C. Auer, EPA
B. Leczynski, EPA
S. Russell, ACC
J. Keith, ACC

CAS Numbers used in the Fuel Oils Category

CAS #	CAS Inventory Name
64741-62-4	Clarified oils, petroleum, catalytic cracked
64742-90-1	Residues, petroleum, steam-cracked
68131-05-5	Hydrocarbon oils, process blends
68409-73-4	Aromatic hydrocarbons, biphenyl-rich
68475-80-9	Distillates, petroleum, light steam-cracked naphtha
68513-69-9	Residues, petroleum, steam-cracked light
68514-34-1	Hydrocarbons, C9-14, ethylene-manuf.-by-product
68527-18-4	Gas oils, petroleum, steam-cracked
68921-67-5	Hydrocarbons, ethylene-manuf.-by-product distn. residues
69013-21-4	Fuel oil, pyrolysis
69430-33-7	Hydrocarbons, C6-30
8002-05-9	Petroleum

Note: The definitions, found in the TSCA Chemical Substance Inventory, for the CAS numbers included in this group are vague with respect to composition. Therefore, it is not uncommon to find that the same CAS number is correctly used to describe different streams (compositions) or that two or more different CAS numbers are used to describe the same stream (composition).